

**From:** [DeMaria, Eva](#)  
**To:** [LIVERMAN Alex](#)  
**Cc:** [Zhen, Davis](#); [MANZANO Scott](#); [MCCLINCY Matt](#)  
**Subject:** RE: ETA on Brazil SCD concurrence?  
**Date:** Tuesday, March 22, 2016 10:09:00 AM  
**Attachments:** [160322 EPA comments - Brazil Motors draft SCD - NFA.pdf](#)

---

Hi Alex-

I just left a vm regarding EPA comments on this draft SCD (which we largely covered in our conference call on the 16<sup>th</sup>). Again, I think there is some confusion about the process we agreed on. From what I understand, since this was clearly marked as a **draft** SCD/NFA, EPA has the opportunity to provide comments. DEQ is then supposed to address the most important comments in their final SCD. Despite the 5 Tribes concurrence, EPA still has concerns about data gaps and they are itemized in our comments. The City raised similar (if not more) concerns than EPA and I was wondering how DEQ addresses the City's concerns/comments? Thus, this is not the step in which EPA provides the "concurrence" letter. We would provide it after a final SCD/NFA is issued which hopefully addresses EPA's concerns. In this case, even with the current data gaps, EPA agrees that this site has a low potential for impacts to the river via the direct ground water discharge pathway. I think more clarification on the stormwater pathway is needed to ensure that contaminants are not carried through sheet flow from the site to two nearby storm inlets, one (AMZ-188) of which is located just off the south lot in the direction from which surface water would flow offsite. The other inlet (ANB-502) is located just off the north lot also in the direction of flow offsite.

Please find attached, EPA's comments which we discussed on the 16<sup>th</sup>. Although I haven't clearly marked sections as "important" and "for consideration", in the interest of time, I'm sending them to you. I would consider the "general comments" important. Thanks.

Eva

---

**From:** LIVERMAN Alex [mailto:liverman.alex@deq.state.or.us]  
**Sent:** Tuesday, March 22, 2016 8:54 AM  
**To:** DeMaria, Eva <DeMaria.Eva@epa.gov>  
**Cc:** Zhen, Davis <Zhen.Davis@epa.gov>; MANZANO Scott <MANZANO.Scott@deq.state.or.us>; MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>  
**Subject:** ETA on Brazil SCD concurrence?

Hi Eva.

Can you please let me know when you will be able to respond to DEQ's proposed SCD memo for the Brazil site? We requested your 30 day review on Jan 29<sup>th</sup>, 2016. I understand that you postponed responding until we had agreement on the process issues we have been discussing. From our last conversation about it on March 15<sup>th</sup>, I understood that you would be providing a concurrence letter. I requested that you deliberate further as to whether to note a data gap on soil sampling in the south yard, given that the potential for soil mobilization to the river is not likely.

Because the 5 Tribes had no comments on the proposed SCD, the potential site impacts to the river are very limited, if any, and the site owner is trying to sell the property, it would be very helpful if DEQ could issue the decision and close the project out for the site owner. Thank you for your consideration.

--Alex

**L. Alexandra Liverman**

Portland Harbor Stormwater Coordinator

Oregon Department of Environmental Quality  
Northwest Region Cleanup Program  
700 NE Multnomah Street, Suite 600  
Portland Oregon 97232-4100

503-229-5080

503-229-6945 (fax)

[liverman.alex@deq.state.or.us](mailto:liverman.alex@deq.state.or.us)